



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

DEC 13 2000

400 Seventh St., S.W.
Washington, D.C. 20590

Ms. Marilyn Dirkx
Manager, Dangerous Goods Compliance
Alaska Airlines
Box 68900
Seattle, WA 98168-0900

Reference No.: 00-0206

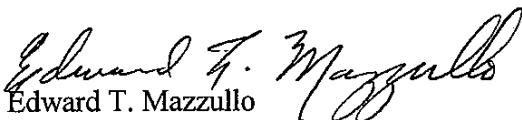
Dear Ms. Dirkx:

This is in response to your July 24, 2000 letter concerning certain carbon dioxide cylinders that are used in a medical device to administer needle-free injections. Specifically, you asked if the cylinders may be carried on board a passenger aircraft in checked or carry-on luggage under the exception in § 175.10(a)(4)(i), 175.10(a)(18) or § 175.10(a)(25) of the Hazardous Materials Regulations (49 CFR Parts 171-180). I apologize for the delay and any inconvenience it may have caused.

Based on our review of information provided by a manufacturer of these medical devices, it is our opinion that the cylinders may be carried aboard passenger-carrying aircraft in checked or carry-on luggage under the provision in § 175.10(a)(4)(i). The devices do not qualify for the exceptions in §§ 175.10(a)(18) and 175.10(a)(25). The Federal Aviation Administration is in agreement with this position.

Should you have further questions, please contact this office.

Sincerely,



Edward T. Mazzullo
Director, Office of Hazardous Materials Standards



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U.S. Department of Transportation
Research and Special Programs Administration
Office of Hazardous Materials Standards
400 Seventh St SW
Washington, DC 20590
Attn: Mr. Ed Mazzullo

July 24, 2000

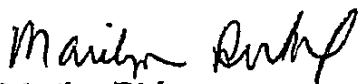
Dear Mr. Mazzullo:

Recently, a passenger attempted to carry in his checked luggage two small carbon dioxide cylinders used for administering medical injections. They were discovered during CTX screening. (The CTX is an explosive detection x-ray system that has been instrumental in detecting undeclared hazardous materials.) The screener advised the passenger that the cylinders could not be carried in luggage, and the passenger was forced to remove them from his luggage. The passenger, a physician, was very irritated, and stated that these small carbon dioxide cylinders are very common and that people are carrying them around all the time. According to the supervisor who responded to the call by the CTX operator, the cylinders were smaller than the type used in live vests that are approved for carriage by 49CFR 175.10(a)(25).

My question to you is this: May small carbon dioxide cylinders used for the administration of medical injections be carried onboard or transported in checked luggage as permitted in 175.10(a)(25), or 175.10(a)(18), or can they be considered medicinal and allowed per 175.10(a)(4)(i)?

Thank you for your response.

Sincerely,



Marilyn Dirks
Manager, Dangerous Goods Compliance
Tel 206-431-7442
Fax 206-433-3225

To: Mr. Ed Mazzullo
U.S. Department of Transportation
Research and Special Programs Administration
Office of Hazardous Materials Standards
Fax number 202-366-3012

From: Marilyn Dirkx
Manager, Dangerous Goods Compliance
Alaska Airlines
Fax number 206-433-3225
Tel number 206-431-7442

Pages: 2 including this cover.